

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ERIN WILSON, *individually and on behalf of others similarly situated*, :
Plaintiff, :
v. : CIVIL ACTION NO.
McNamara Chiropractic LLC, : 2:25-cv-00201-SCJ
Defendant. :

**DEFENDANT MCNAMARA CHIROPRACTIC LLC'S SECOND
UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO CLASS ACTION COMPLAINT OF ERIN
WILSON**

Come now Defendant McNamara Chiropractic LLC (“Defendant”) by and through undersigned counsel, files this Second Unopposed Motion for Extension of Time to Answer or Otherwise Respond to the Class Action Complaint of Plaintiff Erin Wilson. In support thereof, Defendant states as follows:

1. Upon information and belief, Plaintiff Erin Wilson, individually and on behalf of others allegedly similarly situated (“Plaintiff”), filed the instant class action on July 9, 2025. [Doc. No. 1.].
2. On August 8, 2025, Defendant filed an Unopposed Motion for Extension of Time to answer or otherwise respond to Plaintiff’s Complaint, which the Court granted on August 11, 2025. [Doc. No. 9, 10.].

3. Pursuant to the Court's Order, Defendant's answer or response to Plaintiff's Complaint is currently due on August 31, 2025. [Doc. No. 10].

4. Defendant and its counsel are continuing to evaluate the factual allegations stated in the Complaint, research Defendant's records, and determine the circumstances involved.

5. Despite these efforts, Defendant requires additional time to complete its investigation and prepare an appropriate response to Plaintiff's Complaint.

6. Thus, Defendant respectfully requests a brief fourteen (14) day extension of time, through and including September 14, 2025, to submit its Answer or other responsive pleading.

7. Counsel for Defendant consulted with Plaintiff's counsel regarding this Motion. Plaintiff consents to this Motion and the relief requested herein.

8. This Motion has been filed before the time required for Defendant to submit its responsive pleading expires.

9. A proposed Order granting the relief requested in this Motion is attached hereto.

WHEREFORE, Defendant, with the consent of Plaintiff, respectfully requests that its Second Unopposed Motion for Extension of Time to answer, plead or otherwise respond to Plaintiff's Class Action Complaint be granted and that the time to do so be extended fourteen (14) days, through and including September 14,

2025. A proposed order has been attached for the consideration by the Clerk of Court pursuant to N.D. Ga. LR 6.1.

Respectfully submitted this 28th day of August 2025.

JACKSON LEWIS P.C.

/s/ Eric R. Magnus

Eric R. Magnus
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CERTIFICATION

In accordance with LR 5.1(C), N.D. Ga., I hereby certify that this document has been prepared in 14 point, Times New Roman font. I also certify that Defendant has complied with the attorney-conference requirement of LR 7.1(B), N.D. Ga., and Plaintiff consents to this Motion and the relief requested.

/s/ Eric R. Magnus

Eric R. Magnus
Georgia Bar No. 801405

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Plaintiff,	:	
	:	CIVIL ACTION NO.
v.	:	2:25-cv-00201-SCJ
	:	
McNamara Chiropractic LLC,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I certify that on August 28, 2025, I electronically filed the foregoing
**SECOND MOTION TO EXTEND TIME TO ANSWER CLASS ACTION
COMPLAINT** with the Clerk of the Court using the CM/ECF system which will
automatically send email notification of such filing to the following attorneys of
record:

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